Anti-Slavery and Human Trafficking Policy

Aims of this Policy

This policy supports our commitment to limiting the risk of modern slavery occurring within our own business or infiltrating our supply chains or any other business relationship.

The policy applies to all persons working for or on our behalf in any capacity, including employees, directors, officers, agency workers, contractors, consultants and any other third party representative.

We expect all who have, or seek to have a business relationship with the company to familiarise themselves with this policy and to act at all times in a way that is consistent with its values.

We will only do business with organisations who fully comply with this policy or those who are taking verifiable steps towards compliance.

This policy will be used to underpin and inform any statement on slavery and human trafficking that we are required to produce further to the transparency in supply chain requirements of Section 54 of the Modern Slavery Act 2015 (MSA).

What do we Mean by Modern Slavery?

Modern slavery can take many forms. It is a complex and multi-faceted problem. The MSA covers four key criminal activities:

Slavery: where ownership is exercised over an individual
Servitude: involves the obligation to provide service imposed by coercion
Forced and compulsory labour: all work or service, not voluntarily performed, which is obtained from an individual under the threat of force or penalty.
Human trafficking: involves arranging or facilitating the travel of another with a view to exploiting them

All forms of modern slavery have in common the deprivation of a person's liberty by another in order to exploit them for commercial or personal gain and amount to a violation of an individual's fundamental human rights.

Tackling modern slavery requires us all to play a part and remain vigilant to the risk in all aspect of our business and business relationships.

How we Seek to embed our Anti-Slavery Policy in practice

To underpin our policy commitments, we have implemented the following measures:

- We conduct regular risk assessments to determine which parts of our own business and which of our supply chains are most at risk from modern slavery.
- Where appropriate, as informed by our risk assessment, we will engage directly with suppliers in respect of our anti-slavery policy in order to gain a proper understanding of the measures they have in place to ensure that modern slavery is not occurring within their own businesses.

Responsibility for this Policy

The Managing Director has overall responsibility for this policy and in ensuring that the Company complies with all its legal and ethical obligations.

The Operations Director will have the primary day-to-day responsibility for the implementation of this policy, monitoring its use and ensuring that the appropriate processes and control systems are in place, and amended as appropriate, to ensure it can operate effectively.

All Line Managers are responsible for ensuring that those reporting directly to them comply with the provisions of this policy in the day to day performance of their roles.

Communication and Employee Awareness Training

The will ensure that all relevant staff receive adequate training on this policy and any supporting processes applicable to their role.

Breaches of this Policy

Any breaches of this policy will be taken seriously and dealt with on a case by case basis.
The breach of this policy by an employee, director or officer of the company may lead to disciplinary action being taken in accordance with our disciplinary procedure. Serious breaches may be regarded as gross misconduct and may lead to immediate dismissal further to our disciplinary procedure.

Everybody to who whom this policy applies will be expected to co-operate to the fullest extent possible in any investigation into suspected breaches of this policy or any related processes or procedures.

If any part of this policy is unclear, clarification should be sought from the HR Department.